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November 17, 2014

By ECF

The Hon. John Gleeson
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

***Re: United States v. Agron Hasbajrami,
11 Cr. 623 (JG)***

Dear Judge Gleeson:

We represent Defendant Agron Hasbajrami in the above-referenced matter and write to respectfully request an amendment to the pretrial motion schedule to incorporate deadlines for the filing of amicus briefs.

Specifically, we respectfully request permission for the American Civil Liberties Union ("ACLU") to file an amicus brief on December 5, 2014, in support of Defendant's motions. To the extent that any organization wishes to submit a brief in opposition to defendant's motions than we respectfully request that such deadline be scheduled for January 2, 2014. The deadlines for the parties' briefs would remain unchanged.

Accordingly, we respectfully request that the pretrial motion schedule proceed as follows:

- Defendant's pretrial motions due: Wednesday, November 26, 2014;
- Amicus briefs in support of pretrial motions due: Friday, December 5, 2014;
- Government's response brief in opposition to pretrial motions due: Wednesday, December 24, 2014;
- Amicus briefs in opposition to pretrial motions due: Friday, January 2, 2015;
- Defendant's reply brief in support of pretrial motions due: Friday, January 9, 2015; and
- Government's CIPA Section 4 submission due: Friday, January 9, 2015.

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Thank you for your time and consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'MKB', with a long, sweeping horizontal line extending to the right.

Michael K. Bachrach
Steve Zissou
Attorneys for Defendant Agron Hasbajrami

MKB/mb

cc: AUSA Seth DuCharme (by ECF)